

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 1:23-cv-22322-KMW

BETTY'S BEST, INC.,

Plaintiffs,

vs.

THE INDIVIDUALS, PARTNERSHIPS,
AND UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A,"

Defendants.

**MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING¹**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Katherine Burghardt Kramer, Esq., of the law firm of DGW Kramer LLP, One Rockefeller Plaza; Ste. 1060, New York, NY 10020, Tel: (917) 633-6860, for purposes of appearance as co-counsel on behalf of the following sixty-four (64) Defendants as identified in Schedule A to the Complaint [DE 11] ("Defendants"):

Doe No.	Marketplace	Merchant Name
702	Other	anblinlast
704	Other	approachee
713	Other	awakelet
714	Other	beautifuldeer
715	Other	befullofbest
720	Other	blink-rain
728	Other	cheap-easy-go
735	Other	conversionb

¹ This Motion was previously denied on September 21, 2023 [DE 77] because counsel had not associated all of the defendants as listed on the docket. This has been remedied with this filing.

743	Other	dice-fox
754	Other	enjoyaitlife
763	Other	fankisses
765	Other	feelrational
767	Other	firemid
769	Other	flowercog
772	Other	formulalm
773	Other	frame-wood.
775	Other	futuremagics
778	Other	glossarye
780	Other	gorgeifous
781	Other	gorgeousdo
785	Other	hailoyearn
786	Other	happytoobtain
798	Other	infrontofmoon
800	Other	jewelawne
803	Other	jingle-shines
817	Other	lovermelody
818	Other	lovertune
819	Other	luckyarrange
821	Other	match-better
822	Other	matureidea
825	Other	meotilicn
831	Other	moonlightooze
832	Other	movingtune
839	Other	onalevelwith
840	Other	opportunity
847	Other	purebluestars
858	Other	semi-sugarism
870	Other	smarts-blue
871	Other	somethebest
877	Other	subtlecloud
878	Other	sunnylada
879	Other	sunshinebl
880	Other	superbzeal
883	Other	swan-sunny
888	Other	theflycloud

891	Other	tophotred
904	Other	witmethod
906	Other	alcartoonly
907	Other	allhaulm
909	Other	bulk-supplement
910	Other	confidencem
911	Other	costumebrand
912	Other	embravewise
913	Other	goblinpocket
914	Other	happyhours-rover
915	Other	implicitm
916	Other	inputependa
917	Other	magicport
918	Other	milletgo
919	Other	mite-wood
922	Other	puppup
923	Other	rationalu
924	Other	supvogue
927	Other	youngfight

Counsel is appearing for these Defendants in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, agrees to receive electronic filings in this case, and in support thereof states as follows:

1. Ms. Kramer is not admitted to practice in the Southern District of Florida and is a member in good standing of the New York and Vermont state bars, and also is admitted to practice before and is in good standing with the United States District Court for the Southern District of New York, the United States District Court for the District of Vermont, the 2nd Circuit Court of Appeals, and other federal courts.

2. Movant, Nicole W. Giuliano, Esq., of the law firm of Giuliano Law Group, P.A., 121 S. Orange Avenue, Suite 1500, Orlando, FL 32801, Tel: (321) 754-5290, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be

designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Ms. Kramer will be making payment of this Court's admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. As referenced in the certification, this is the first *pro hac vice* application for Ms. Kramer within the past 365 days.

5. Ms. Kramer, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Ms. Kramer at email address kkramer@dgwllp.com.

WHEREFORE, Nicole W. Giuliano moves this Court to enter an Order allowing Katherine Burghardt Kramer to appear *pro hac vice* before this Court on behalf of the above referenced Defendants as identified in Schedule A to the Complaint, in the above-styled matter and directing the Clerk to provide notice of electronic filings to Ms. Kramer.

Dated: September 21, 2023

Respectfully submitted,

/s/ Nicole W. Giuliano

Nicole W. Giuliano, Esq.

Florida Bar No. 71067

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*Attorney for Defendants as referenced in
Schedule A of the Complaint*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this Motion has been served this 21st day of September via CM/ECF to all interested parties.

/s/ Nicole W. Giuliano